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*Attorneys for Plaintiff, Deutsche Bank National Trust Company as Trustee for New Century Home Equity Loan Trust, Series 2005-D, Asset Backed Pass-Through Certificates*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST  
 COMPANY AS TRUSTEE FOR NEW  
 CENTURY HOME EQUITY LOAN TRUST,  
 SERIES 2005-D, ASSET BACKED PASS-  
 THROUGH CERTIFICATES,

Plaintiff,

vs.

WESTCOR LAND TITLE INSURANCE  
 COMPANY; DOE INDIVIDUALS I through X;  
 and ROE CORPORATIONS XI through XX,  
 inclusive,

Defendants.

Case No.: 2:20-cv-01706-APG-VCF

**MOTION FOR EXTENSION TO FILE  
 RESPONSE TO MOTION TO DISMISS  
 [ECF No. 9]**

**(Third Request)**

Plaintiff, Deutsche Bank National Trust Company as Trustee for New Century Home Equity Loan Trust, Series 2005-D, Asset Backed Pass-Through Certificates, by and through its counsel of record, respectfully moves for an Order extending its deadline to file a Response to Defendant Westcor Land Title Insurance Company's (**Westcor**) Motion to Dismiss [ECF No. 9].

On September 22, 2020, Westcor filed a motion to dismiss [ECF No. 9]. Responses to the Motion were due by October 6, 2020. Westcor subsequently agreed to an extension of fourteen days to October 20, 2020 [ECF No. 13]. Realizing additional time was required, plaintiff requested an additional extension of one week. In response, Westcor was only agreeable to an extension of two days [ECF No. 18]. Plaintiff accepted that extension with the promise to, in good faith, attempt to meet the deadline while reserving the right to move for additional time.

1 Plaintiff has attempted to meet the current deadline, but does not believe it will be able to  
 2 do so without compromising the quality of the briefing. This extension is required, in part,  
 3 because plaintiff's counsel was out of town for much of the past several days, and had other  
 4 immediate deadlines that arose upon his return. In addition, in the process of preparing the  
 5 opposition, plaintiff has determined it appropriate to file a counter-motion for summary judgment.  
 6 Plaintiff believes it makes more sense that the counter-motion for summary judgment be filed  
 7 simultaneously with the opposition to the motion to dismiss (one document filed twice to comply  
 8 with local rules).

9 Accordingly, plaintiff respectfully requests an additional two weeks to respond to the  
 10 pending motion to do dismiss. If that court does not believe that appropriate, at a minimum,  
 11 plaintiff's counsel respectfully requests through the weekend to work on the opposition and  
 12 counter-motion until October 26, 2020.

13 This is the third request for an extension of time for plaintiff to file a response to  
 14 Westcor's Motion to Dismiss. The extension is requested in good faith and is not for purposes of  
 15 delay or prejudice to any other party.

16 DATED this 21st day of October, 2020.

17 WRIGHT, FINLAY & ZAK, LLP

18 /s/ Darren T. Brenner, Esq.

19 Darren T. Brenner, Esq.

20 Nevada Bar No. 8386

21 Lindsay D. Robbins, Esq.

22 Nevada Bar No. 13474

23 7785 W. Sahara Ave., Suite 200

24 Las Vegas, NV 89117

25 *Attorneys for Plaintiff, Deutsche Bank*

26 *National Trust Company as Trustee for*

27 *New Century Home Equity Loan Trust,*

28 *Series 2005-D, Asset Backed Pass-Through  
 Certificates*

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: October 21, 2020

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I served the foregoing **MOTION FOR EXTENSION TO FILE RESPONSE TO MOTION TO DISMISS [ECF No. 9]** on the 21st day of October, 2020, to all parties on the CM/ECF service list.

/s/ Jason Craig  
An Employee of WRIGHT, FINLAY & ZAK, LLP